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Attorneys for Defendants

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

VANESSA WUTHRICH,)	Case No.: 2:21-cv-00160-JCM-VCF
)	
Plaintiff,)	STIPULATION AND ORDER TO
vs.)	EXTEND SCHEDULING ORDER
)	DEADLINES
INTELIDENT SOLUTIONS, LLC, a)	
Foreign Corporation, COAST DENTAL)	
SERVICES, LLC, a Foreign Corporation;)	(Ninth Request)
COAST DENTAL OF NEVADA, INC.,)	
a Domestic Corporation; KATHERINE)	
BALMER, an individual; and DOES I-X)	
and ROE CORPORATIONS I-X,)	
)	
Defendants.)	

The parties, by and through their respective counsel, hereby stipulate to extend the Scheduling Order deadlines in this case as follows:

Discovery Deadline	December 8, 2023
Dispositive Motion Deadline	January 8, 2023 ⁴
Joint Pretrial Order	February 7, 2024, or 30 days from the ruling on a dispositive motion

This is the ninth request for an extension of these deadlines. The parties provide the following information regarding the proposed extension of the discovery deadline:

Discovery Completed to Date

The parties have served their Initial Disclosures. Defendants have served interrogatories and requests for production, and Plaintiff has responded. Plaintiff has served seven sets of interrogatories and requests for production, and Defendants have responded, although there are meet and confer issues concerning the discovery responses on both sides. Plaintiff's deposition was originally planned for April 27, 2022, but needed to be rescheduled for reasons outlined in previous submissions. Plaintiff's deposition and two other key depositions were then scheduled for September 7, 9 and 13, but had to be postponed due to the recent developments set forth below.

Remaining Discovery to Be Completed

Depositions of Plaintiff, Defendant Balmer, Rule 30(b)(6) deponents and other current and former employees of Coast Dental, and related written discovery.

Reasons Discovery Could Not Be Completed Within the Existing Deadline

The parties have acted in good faith in attempting to comply with discovery deadlines. The Court signed a scheduling order extending deadlines until August 10, 2023. A corresponding order was entered on April 24, 2023. The parties agreed to the stipulation after counsel for Plaintiff underwent surgery and experienced post-operative complications. In late May 2023, counsel for Defendant experienced emergent health issues, which required hospitalization. Also, due to staffing issues, it has taken longer than anticipated to assign this matter to another attorney while defense counsel continues rehabilitation. Therefore, the parties have agreed to extend the remaining deadlines to ensure adequate time to conduct depositions and review propounded discovery after the deposition prior to the deadline for dispositive motions. Accordingly, the parties respectfully request deadlines be extended for a period of 120 days as noted below.

Proposed Dates for Completion of Discovery

The parties believe they will be able to complete discovery by the proposed new date of December 8, 2023.

Dated this 17th day of July, 2023.

FISHER & PHILLIPS

KEMP & KEMP

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IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: 7-19-2023

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